FILED
11-14-07
04:26 PM

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Rulemaking to Implement the Commission's Procurement Incentive Framework and to Examine the Integration of Greenhouse Gas Emissions Standards into Procurement Policies.

R.06-04-009

REPLY COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON ALLOWANCE ALLOCATION ISSUES

I. INTRODUCTION

Pursuant to the October 15, 2007 "Administrative Law Judges' Ruling Requesting Comments and Noticing Workshop on Allowance Allocation Issues," the Division of Ratepayer Advocates (DRA) respectfully submits the following reply comments following the November 5, 2007 workshop at which these issues were further discussed. DRA observes that it is difficult to reach final conclusions about the optimal distribution of allowances through auctions and/or administrative allocation in the absence of information regarding potential rate impacts that would result under various scenarios. As discussed in Section II F below, information that would allow comparison of the rate impacts that would occur under various scenarios would be useful in reaching the ultimate recommendations about distribution of allowances.

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II. DISCUSSION

A. All providers of electricity should be required to achieve greenhouse gas (GHG) reductions beginning in 2012 reductions using a common benchmark.

DRA observes that while parties have different positions in the initial allocation methodology, there is general consensus that "allocation should be made in a manner that ensures that all providers of electricity eventually reach the same level of carbon intensity."[1] The real questions then become "how soon should the common benchmark be adopted for all regulated entities?" and "how much time should the entities be given to transition to this common benchmark," given that they have different starting points. The Los Angeles Department of Water and Power (LADWP) proposes the year 2020 for reaching a common benchmark goal.[2] This would allow a transition period of thirteen years, starting with the enactment of Assembly Bill (AB) 32, when GHG emission reduction became an imminent reality, and ending when all regulated entities are required to achieve the benchmark level. Thirteen years is an unnecessarily long transition period and does not adequately further AB32's intent that immediate actions are necessary to mitigate the potential irreversible impacts of global warming.

In fact, global warming has been an internationally recognized issue since the introduction of the Kyoto Protocol into a United Nations treaty on December 11, 1997. While a GHG-emitting entity might have chosen not to mitigate emissions in the past ten years, there should be no further latitude to delay actions. The longer the transition period, the more time such an entity can continue to conduct business as usual.

As discussed in DRA's opening comments,[3] DRA advocates application of a common benchmark based on a "lbs CO2e/MWH" metric to all regulated entities beginning in the year 2012. Under an administrative allocation scheme, emission

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[1] Opening Comments of San Diego Gas & Electric Company (SDG&E) p. 6.

[2] Opening Comments of Los Angeles Department of Water and Power (LADWP) p. 13.

[3] Opening Comments of DRA, p. 29.

allowances would then be distributed based on the output/load served of the regulated entity. This would allow a transition period of five years, starting with the year 2007 (or three months after the enactment of AB32.) DRA estimates that in the year 2012, firm contractual commitments, including utility-owned generation, will account for 60 - 70% of the total procurement needs for the investor-owned utilities.[4] In other words, the investor owed utilities (IOUs) would be procuring supply to meet at least 30% of their projected load. There is ample opportunity between now and 2012 for an IOU to significantly alter the carbon content of its portfolio. In contrast, publicly owned utilities (POUs), when compared to the IOUs, are more fully resourced, i.e. have acquired resources to serve their customers by ownership or long-term contract.[5] It would be informative to understand the extent to which POUs are resourced beyond 2012. DRA recommends that the Joint Commission staff issue a data request to the POUs to determine the percentage of their projected load in 2012 and beyond that have been met with firm resource commitments.

B. DRA supports expanding the evaluation criteria to consider supply-side reliability as well as scalability to a regional/national program

DRA supports two of the additional allowance distribution principles advocated by SDG&E: (1) "continues to maintain reliability of the electric and natural gas supplies" and (2) the ability to "scale up to a regional/national program."[6]

The method of allowance distribution has broad implications for both consumer prices as well as producer costs, and indirectly on the reliability of the electric and gas supplies. Unless California is ready to import 100% of the electricity needs, it is important to maintain a healthy business climate for generators to continue their investments in California. The question of avoiding windfall profits to generators should

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[4] This estimate is based on the 2006 Long Term Procurement Plans submitted by the IOUs.

[5] This statement was made by Mr. Jim Lazar, representing the City of Burbank Water and Power (Burbank) at the November 5, 2007 Joint CEC-CPUC Workshop on GHG Emission Allocation for the Electricity Sector. Refer to workshop transcript, p. 194.

[6] Opening Comments of SDG&E, p. 4.

be of secondary importance to how retail rates are impacted and whether generators will be able to recover costs. The GHG modeling project for the electricity sector undertaken by E3 should be an important tool for the joint Commission staff as well as stakeholder groups in order to understand the economic impacts of different allocation methodologies from both the ratepayer and the producer perspective.

The issue of "scalability" is relevant in light of the observation noted in AB32 that "action taken by California to reduce emissions of greenhouse gases will have far-reaching effects by encouraging other states, the federal government, and other countries to act."[7] In order to ease the transition to a prospective federal policy, California policymakers should be mindful of creating a general framework for an allocation system that can be adopted both regionally and nationwide.

Southern California Edison Company's (SCE) proposal for distributing allowances fails this criterion of scalability. SCE recommends distribution of emissions allowances "in proportion to the 'economic harm' that results from the imposition of GHG regulations on such entities."[8] In other words, the primary criterion for allocation is the financial impact of GHG regulation, which would be calculated with a formula that incorporates historical emissions and portfolio data to determine entity-specific allowance allocations. In this methodology, free allowances would be allocated based on each entity's relative share of economic harm, according to this formula.[9] This proposal is predicated on the idea that load serving entities (LSEs) and/or generators (depending on the point of regulation ultimately adopted) need incentives proportionate to the potential increases in the cost of power to each entity in order to effectively reduce GHG emissions. This principle fails to recognize and reward early action taken by other entities to procure cleaner sources of power. One of the clear mandates of AB 32 is that

[7] Section 38501 (d) of the Health and Safety Code.

[8] Comments of Southern California Edison Company on Questions Presented in Administrative Law Judge's Ruling Regarding Comments and Notice of Workshops on Allowance Allocation Issues, October 31, 2007 (Edison Comments) at 3.

[9] *Id*. at 6.

any regulatory program for reducing GHG emissions must reward early action taken by entities.[10] Relying exclusively on historical emissions as a benchmark for allowance allocations would send the wrong signal to current entities and new market entrants in California and nationwide. In order to send the correct signal and to promote the principle of scalability, the Commission should reject SCE's proposal.

C. Multi-sector auctions should be considered as an option for allowance distribution, and conversely, auction revenue should not be limited to projects related to only the electricity and/or natural gas sectors.

1. DRA disagrees that AB 32's market-based compliance mechanisms do not include auctions.

DRA disagrees with the contention of Southern California Public Power Authority (SCPPA) that an auction is not included as a market-based compliance mechanism permitted by AB 32.[11] Section 38505(k)(1) of California's Health and Safety Code includes "[a] system of market-based declining annual aggregate emissions limitations for sources or categories of sources that emit greenhouse gases" as a "market-based compliance mechanism." Distribution of allowances through an auction would be the quintessential "market-based" mechanism for distributing allowances under a scheme of declining emissions limitation. Moreover, Section 38561 of the Health and Safety Code, which describes the process for the California Air Resource Board's (CARB) adoption of a scoping plan for achieving the "maximum technologically feasible and cost-effective reductions of greenhouse gas emissions"[12] directs CARB to make recommendations about market-based compliance mechanisms[13] after considering "all relevant information pertaining to greenhouse gas reduction programs in other states, localities and nations, including the northeastern states of the United States…"[14] where allowances are fully or

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[10] Section 38562(b)(3) of the Health and safety Code.

[11] Opening Comments of SCPPA, p. 23.

[12] Section 38561(a) of the Health and Safety Code.

[13] Section 38561(b) of the Health and Safety Code.

[14] Section 38561(c) of the Health and Safety Code.

partially auctioned by the Regional Greenhouse Gas Initiative (RGGI) states. The Joint Commissions should reject the assertion that an auction is off the table as a potential method for distribution of some or all of emissions allowances.

2. DRA disagrees that distribution of auction proceeds should be limited to the electric and or natural gas sectors

In the opening comments, parties generally assume that should an auction approach be adopted to distribute part or all of the allowances, the allowances would be limited to those for the electricity and/or natural gas sectors. It is yet unclear how CARB plans to distribute emission allowances to other sectors; it is possible that allowances will be also auctioned to regulated entities in these other sectors. If such is the case, then it would be administratively simpler to conduct centralized auctions on a periodic basis for all sectors, regardless of whether the allowances are partially auctioned or fully auctioned.

Distributing allowances through auctions specific to a single sector would not be easily scalable to a regional or national program. Administering separate auctions to cover all sectors for all states might create price distortions and arbitrage opportunities with different allowance prices at different auctions. The allowance to emit one ton of CO2e should have the same value across multiple sectors and regions. In order to achieve this result, there should be a single centralized auction for all covered sectors under AB32.

Furthermore, parties assume that auction revenue would be earmarked for projects related to only the electricity and/or natural gas sectors. DRA recommends that auction revenue be expended on projects that further the goals of AB32 in the most cost-effective manner; this may include public transit infrastructure projects, development of zero emission technologies, and even a per-capita rebate, as proposed by Climate Protection Campaign.[15] It is important to note that ratepayers are also consumers; they will be impacted by electricity/natural gas rate increases as well the price increase of other

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[15] Opening Comments of the Climate Protection Campaign, p. 2.

consumer goods and services. Limiting auction revenue from a single sector to expenditures within that same sector would likely create missed opportunities for reducing GHG emissions as cost effectively as possible in the long term.

C. Combined Heat and Power facilities should be considered separately from the electric sector for allowance allocations.

The joint comments of the Energy Producers and Users Coalition (EPUC) and the Cogeneration Association of California (CAC) contend that under an auction-based allocation, combined heat and power (CHP) systems will be discouraged, even though they reduce overall GHG emissions.[16] EPUC and CAC point out that an industrial facility might face a decision to purchase electricity from the grid, or produce the same amount of electricity on-site using a CHP system. EPUC and CAC note that using a CHP system is often the more energy-efficient option, and lowers overall GHG emissions.[17] However, if the industrial facility purchased the electricity from the grid, the utility or generator (or other player, depending on point of regulation) would be responsible for the GHG emissions. Using a CHP system, on the other hand, would place the responsibility of those emissions on the industrial facility. This extra, potentially costly, responsibility could deter adoption of CHP systems, which could be counterproductive to reducing overall GHGs. EPUC and CAC therefore request administrative allocation of allowances.

Their concern highlights a challenge of regulating entities that fall across market sectors. However, addressing the challenges of CHP should not determine the policy choices for the entire electric sector. Instead, this issue merits consideration of the appropriate treatment of CHP systems under a cap-and-trade framework, which can be done irrespective of how allowances are allocated overall. Under *any* of the allocation systems being explored, some sort of special allocation to CHP systems may be

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[16] Opening Comments of EPUC/CAC, pp.15-17.

[17] Id. at 16.

necessary, as noted by EPUC and CAC.[18] Even when allowances are freely allocated, there is no guarantee that CHP systems will be allocated enough permits to cover their increase in emissions. Thus, the challenge will not disappear by avoiding an auction system.

EPUC and CAC raise valid concerns, but industry and statewide decisions should not hinge on this one special case. Instead, DRA recommends that the CHP issue not influence electricity sector allocation decisions, but that the CPUC/CEC/ARB separately consider this issue. EUPC and CAC suggests the 'double-benchmarking' technique employed in the European Union's ETS.[19] DRA neither opposes nor supports this method, but believes that the decision on how to treat CHPs should be reserved until after broader electric-sector decisions are finalized.

Additionally, the true GHG savings of a CHP plant depends on how the central power plant produces electricity. The example EPUC and CAC present on page 16 of their comments assumes some sort of thermal plant as the source of electricity, yet the GHG savings may be far less if low-carbon energy sources were to dominate the electricity mix. As electricity production becomes more efficient and less carbon-intensive, it is conceivable that the relative benefits of CHP systems will lessen. Therefore, DRA cautions against freely allocating permits to CHP facilities based on the assumption that they displace emissions from high-carbon generators. Using the average emission-intensity of electricity generators, as EPUC and CAC suggests, could provide a reasonable benchmark.

D. Biomass and Biogas facilities should be treated as renewable generation

As Sustainable Conservation points out, some electricity generators may be "carbon neutral" without being "carbon free." Electricity generation from solar or wind power are often considered 'carbon free' (or nearly carbon free), as no carbon is emitted by these energy sources. Other generation types, such as biodigesters, emit carbon to the

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[18] Id.at 18.

atmosphere, but those emissions would have occurred anyway, usually due to natural decomposition of the organic fuel source. Such generation is considered carbon-neutral.

DRA agrees that, as a general rule,[20] biomass and biogas generators should not have to hold permits for these 'neutral' carbon emissions. In line with national and international carbon accounting standards, these carbon emissions would not be considered anthropogenic, and therefore should not be counted.

However, DRA does not agree with Sustainable Conservation that these facilities should simply be removed from the regulatory framework. Instead, these facilities should be treated as any other renewable energy facility. Depending on how they are treated under an allocation system, renewable generators may or may not be freely allocated emission permits. Either way, the facilities will not need to purchase permits to cover their carbon emissions.

E. DRA recommends that the Joint Commissions allow parties more time to consider the CO2RC mechanism proposed by Western Resource Advocates (WRA).

The opening comments of WRA propose an alternative load-based cap-and-trade mechanism that is structured around CO2 Reduction Credits (CO2RC) rather than CO2 emission allowances. In a nutshell, the CO2RC system designates a regulatory agency that awards CO2RCs to generators based on the tons of CO2 avoided when compared to a benchmark emission level for a given output level. As an example, using a pulverized coal plant with an emission rate of 1000 tons CO2/GWh as the benchmark, a combined cycle combustion turbine that emits 400 tons CO2/GWh would receive 600 CO2RC for every GWh generated. To meet an assigned emission reduction goal, LSEs are required to procure and retire CO2RCs from generators based on its load served.

(continued from previous page)
[19] Id. at 20.

[20] Not all biomass-based generation is carbon neutral. If, for example, large tracts of forests are cut down in order to provide fuel for electricity production, then bio-sequestered carbon would be released in amounts far exceeding natural decomposition. However, the biomass-based generation addressed in Sustainable Conservation's comments focus on *waste* products, such as landfill gas or agricultural waste. Combustion of these products is in fact carbon-neutral, or even carbon-*beneficial*.

DRA agrees that the CO2RC proposal elegantly addresses the issue of emissions tracking (from source to sink) and leakage while promoting clean generation technologies and energy efficiency. It also does not appear to tamper with the CAISO real-time and day-ahead markets. It parallels an updating, output-based 100% allowance allocation methodology with no auction. Although a number of questions need further exploration, including how to avoid windfall profits to generators, how to redirect the revenue generated from the sales of CO2RC from generators to consumers, who should be the CO2RC issuing agency for the California versus a regional program, how to mitigate contract shuffling, and how to accommodate new entrants with no base year emissions data, the CO2RC proposal merits additional consideration.

DRA recommends that the Joint Commissions[21] allow parties additional time to consider the WRA proposal with further comments due on November 28, the same due date for the reply comments on the supplemental information on allowance allocation issues. Furthermore, it would be very helpful if WRA organized teleconference meeting in the interim to address questions from parties regarding its proposed CO2RC mechanism.

F. Before concluding that there any of the proposed allowance allocation methodologies would result in a "transfer of wealth" from one set of ratepayers to another, Joint Commission staff should issue a data request seeking rate impacts data from parties

The comments of SCPPA contend that the consequences of distributing allowances through an auction could be a "wealth transfer from SCPPA to others in the state."[22] This assertion is premised on the reliance of SCPPA communities on fuel that is more carbon intensive than average, so that SCPPA communities would need to purchase more allowances. However, Southern California Gas Company and SDG&E presented information in their August 15, 2007 comments in this proceeding that showed a

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[21] Joint Commissions refer to the California Public Utilities Commission and the California Energy Commission.

[22] Opening Comments of SCPPA, p. 16.

correlation between high emissions and low rates, and between low emissions and high rates. There is not enough evidence before the Joint Commission to conclude that any particular allocation method would unduly burden any particular group of ratepayers, especially since some rates may already reflect early action to reduce emissions.

Before the Joint Commission make decisions regarding the distribution of allowances, and the need to ensure that no group of ratepayers is disproportionately impacted, it should attempt to review potential rate impacts. At the November 5, 2007 Allowance Allocation Workshop at the California Energy Commission (CEC), a representative of Burbank presented a set of data demonstrating the impacts to rates under various GHG emissions allowance scenarios.[23] Such data and analysis should be requested from all California LSEs as a starting point for determining whether and to what extent ratepayers will be harmed under each of the GHG allowance distribution alternatives, and to isolate critical emissions allowance prices for each entity. Furthermore, if such granular data for each California entity is not already represented in the Commission's current modeling exercises, this data could serve as an input into this modeling process to help facilitate the development of entity specific allowance allocations. The Commission recently issued a data request to the service list to elicit key data from relevant entities in the market, and should either amend this request or issue a new one to include the data and analysis discussed at the recent workshop.

[23] Burbank assessed general rate impacts under a $50 per GHG allowance price.

III. CONCLUSION

DRA respectfully requests that the Joint Commissions consider these comments.

Respectfully submitted,

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November 14, 2007

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/s/ Joanne Lark

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Joanne Lark

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